

PDefur Comments on FS

CAG Discussion, March 24, 2014

Attendees: C. Humphrey, A. Conley, B. Quinn, J. Robison, J. Calder, R. Lee, Tom and 2 additional CAG members.

General Comments on PH FS

Make sure all comments are addressed. EPA is still in review phase.

1. **Request:** Want complete plan for controlling upland sources in place before starting cleanup. ROD should address how upland sources will be controlled. DEQ will provide master report which includes stormwater report that they are working on with city. DEQ will do separate public comment on their source control plan. EPA will reference DEQ actions in ROD.

Q: What happens if source control is not in place by time inwater work begins?

A: Would have to help upland facilities get into compliance.

How will significant source control issues coming into river for non legacy contamination). DEQ doing much work upstream of RM11 area – Zidell area. Sites outside of PH, is there a long range plan to address? Unless part of SF listing – DEQ will need to address.

2. Some of the things EPA also sampling for, but DEQ is casting wide net for sampling. Are PCP persistent in soil- is it something that would need to clean up for in future? These tend to dissolve in water – more of a matter of source control and behavior change.

CAG needs to get clarification from Defur on this comment and revisit questions.

3. With PCB WQ criteria are low 6.4nano gram/ liter. We can't get down to that level.

Want to know what it takes to get clean-up to point to meet WQS & Fish. Want another scenario for comparison. Alternative G comes closest to doing this, but doesn't necessary achieve no fish advisory. Also need treatment train of actions like watershed protection plans to continue to reduce levels. The more removal the more disturbing river environment but to some.

Request: Want to see point of clarification for what it takes to get down to WQS. Want clear explanation of why alternative is infeasible.

4. **Request:** FS should tell why a particular alternative is infeasible and outline what it would take to make it possible to get down to the level where unlimited fish consumption possible.
EPA agrees and this description will be included in revised FS. Activated carbon is a treatment that will help bind PCBs to make it unavailable – but doesn't break down. That is challenge because river environment not best because of current. May work better in Swan Lagoon area where water is still. Ppb values.
5. When comparing different alternatives are you taking into consideration the different methods?
All methods do not have same effectiveness – want language changed in FS. We agree.
6. EPA is revising FS to include the metals of concern in final list.
7. CAG wants models to go beyond 45 years for comparing long term effectiveness. EPA looking at monitoring fish as predictor of lowing cont levels rather than requesting additional modeling.
8. **8&9** EPA agrees the sections need to be more concise and readable. The remediation technologies will be in one chapter.
10. CAG-**Disagree with depositional percentage.** Need to look at rate of deposition. Section that don't collect sediment.

11. CAG-[Don't agree with overreliance of MNR in FS.](#)

12. Want good answer of how you calculate risk when multiple chemicals working together. Have synergistic effects been included in cleanup goals?

Specific comments:

1. Correct – won't have exact boundary for RMiles and land until proposed plan.
2. CAG to get clarification from Defur on this question.
3. Model for event larger than 100y flood to account for design life of CDF. Model for 500.
4. EPA agrees with this comment.
5. This can be done.
6. Seasonal – yes for water but not for sediment.
7. Yes upstream sediment bioassays. Usually only run for higher concentration. It was run below the Ross Island areas – looking for baseline.
8. Definitions will be included in document and not just summary. EPA agrees with comment.
9. This change will be made in FS. EPA agrees with comment. Center river mile on hottest concentrations.
10. Arkema. Not depositional – area EPA believes needs to be dredged.
12. Will probably remove from revision. Use rivermile or concentration area. (revise to take out 4 sections and just refer to river mile).

Start at 13 in next discussion.